



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

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OFFICE OF
ECOSYSTEMS, TRIBAL AND
PUBLIC AFFAIRS

April 11, 2016

William W. Stelle, Jr.
Regional Administrator
NMFS West Coast Region
7600 Sand Point Way NE, Building 1
Seattle, WA 98115

Dear Mr. Stelle:

The U.S. Environmental Protection Agency has reviewed the National Marine Fisheries Service March 2016 Final Environmental Impact Statement to Analyze Impacts of NOAA's National Marine Fisheries Service Proposed 4(d) Determination under Limit 6 for Five Early Winter Steelhead Hatchery Programs in Puget Sound. (EPA Region 10 Project Number: 15-0045-NOA).

Project summary

The FEIS evaluates five Hatchery and Genetic Management Plans (HGMPs) for steelhead in Puget Sound. The HGMPs specify the propagation of early-returning ("early") winter steelhead in the Dungeness, Nooksack, Stillaguamish, Skykomish, and Snoqualmie River watersheds in Washington State. The HGMPs were provided by the Washington Department of Fish and Wildlife (WDFW), with the Jamestown S'Klallam Tribe, the Lummi Nation, the Nooksack Tribe, the Stillaguamish Tribes, and the Tulalip Tribes for NMFS's evaluation and determination under Limit 6 of the Endangered Species Act (ESA) 4(d) Rule for listed salmon and steelhead.

Responsiveness to EPA's DEIS comments

Our December, 2015 DEIS comments stated our concern regarding the hatchery programs' potential negative effects on natural-origin steelhead and salmon from genetic risks, competition and predation, hatchery facility effects, incidental fishing effects, and disease transfer. We also stated our concern that the Proposed Action and Reduced Production alternatives provide no possibility for viability benefits to natural-origin steelhead.

Given our concerns, we are pleased to see that the FEIS's new alternative, Alternative 5, the Preferred Alternative, includes a revised HGMP for the Skykomish early winter steelhead hatchery program. Under Alternative 5, 88,400 fewer steelhead would be released into the Skykomish River basin and this would result in, according to the FEIS, "...corresponding decreases in low gene flow, competition and predation risk, and incidental fishing effects..."¹

Also, by identifying and providing rationale in support of Alternative 4 (Native Broodstock) as the potential environmentally preferable alternative, NMFS is being directly responsive to our recommendation for the FEIS to include clarifying information on how NMFS' intends to identify the environmentally preferable alternative. We agree that transitioning to native broodstock programs would

¹ FEIS, p. 119

likely be environmentally preferable because native broodstock programs have the potential to benefit conservation and recovery of listed Puget Sound steelhead, while further reducing environmental effects and contributing to cultural resources associated primarily with recreational and tribal fishing interests.

In addition, to reiterate the factors listed in our DEIS comments, we believe the alternative which best facilitates adaptation - both for fish and people - to habitat loss, changes in oceanic conditions, impacts from dams and diversion, direct predation and climate change would likely be environmentally preferable.

Thank you for this opportunity to comment and if you have any questions please contact me at (206) 553-1601 or by electronic mail at littleton.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,



Christine B. Littleton, Manager
Environmental Review and Sediment Management Unit

